

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

EASTERN DIVISION

No. 05-10849RGS

DOROTHY STANLEY, EXECUTRIX OF THE  
ESTATE OF HELEN A. RUNGE,

Plaintiff

v.

WALTER J. KELLY,  
KERRY L. BLOOMINGDALE, M.D., and  
SUNBRIDGE NURSING AND  
REHABILITATION CENTER,

Defendants

**MOTION IN LIMINE TO PRECLUDE TESTIMONY REGARDING KELLY'S  
ATTEMPTED COMMUNICATIONS WITH ATTORNEY KERR**

NOW COMES the Defendant, Walter J. Kelly, and moves this honorable Court to preclude testimony related to Kelly's attempt to contact Attorney Peter Kerr following the filing of this suit. In support of this motion, the Defendant submits the accompanying Memorandum.

WHEREFORE, Defendant respectfully requests that this Honorable Court preclude any evidence of Walter Kelly's attempt to contact Attorney Kerr.

Respectfully submitted,

The Defendant, Walter J. Kelly,  
By his attorneys,

s/ Michele Carlucci

George C. Rockas, BBO #544009  
Michele Carlucci, BBO #655211  
WILSON ELSER MOSKOWITZ  
EDELMAN & DICKER LLP  
260 Franklin Street  
Boston, MA 02110  
(617) 422-5300

**CERTIFICATE OF SERVICE**

I, Michele Carlucci, certify that on January 30, 2008 I have served a copy of the foregoing by electronic filing.

/s/ Michele Carlucci  
Michele Carlucci